



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

Dirk Kempthorne, Governor  
Toni Hardesty, Director

April 18, 2006

**Certified Mail No. 7005 1160 0000 1550 3444**

Mr. Alan Prouty  
J.R. Simplot Company  
P.O. Box 27  
Boise, ID 83707

RE: Facility ID No. 027-00009, J.R. Simplot Company, Caldwell Facility  
Emission Reduction Credits Certificate of Ownership and Termination  
of PTC No. P-030013

Dear Mr. Prouty:

The Idaho Department of Environmental Quality (DEQ) has processed the J.R. Simplot Co.'s (Simplot) April 4, 2005, request for Emissions Reduction Credits (ERC) in accordance with IDAPA 58.01.01.460 and 461 (Rules for the Control of Air Pollution in Idaho). DEQ cannot grant the full amount of ERCs requested, 8.65 tons of volatile organic compounds (VOCs), because the amount requested is greater than the average amount registered for Tier I emissions fees for fee years 2002, 2003, and 2004. DEQ's records indicate that an average of 6.33 tons of actual VOCs were registered for fee years 2002, 2003, and 2004. Consequently, DEQ can only grant an ERC equal to 6.33 tons.

Otherwise, DEQ has determined that Simplot's request has fulfilled the requirements to bank the requested ERCs. The following table lists the ERCs that are banked and serves as J.R. Simplot Co.'s Certificate of Ownership. Any use of banked ERCs shall be in accordance with the Rules.

EMISSION REDUCTION CREDITS				
PM <sub>10</sub> T/yr	NO <sub>x</sub> T/yr	SO <sub>2</sub> T/yr	VOC T/yr	CO T/yr
0.0	0.0	0.0	6.33	0.0

This letter also serves as notice that Permit to Construct No. P-030013, issued October 17, 2003, for the Ethanol Plant, which includes all associated storage tanks, is hereby terminated effective immediately.

Lastly and in order to fulfill the requirements of IDAPA 58.01.01.460.04, *Permit Issuance*, DEQ will add to Simplot's forthcoming renewed Tier I operating permit, a permit condition that prohibits the operation of the ethanol plant and associated storage tanks, and will impose a VOC emissions limit of zero.

Should you have any questions about this Certificate of Ownership for the ERCs listed above, please contact Bill Rogers, Regional Permit Program Coordinator, at (208)373-0437 or [william.rogers@deq.idaho.gov](mailto:william.rogers@deq.idaho.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Martin Bauer". The signature is fluid and cursive, with the first name "Martin" and last name "Bauer" clearly distinguishable.

Martin Bauer, Administrator  
Air Quality Division

MB/BR/bf      Project No. P-050017

c:      June Hues, Boise Regional Office  
         Laurie Kral, EPA Region 10  
         Bill Rogers, Permit Coordinator